



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: SR-6J

July 25, 2012

Thomas W. Steib
Operations Manager
Detrex Chemicals Division
Elco Corporation
1100 N. State Road
Ashtabula, OH 44004

Re: *Additional DNAPL Recovery Well Installation and Testing Work Plan*
URS Corporation, February 2012

Dear Mr Steib:

On January 6, 2012, EPA directed Detrex to prepare a work plan for the installation and evaluation of DNAPL recovery wells. Detrex prepared the work plan and submitted a draft to EPA on February 6, 2012. EPA gave Detrex authorization to proceed with the MIP Investigation portion of the Work Plan (Task 2.3.3) on February 26. Implementation of the rest of the work was deferred until completion of the MIP investigation.

Detrex proceeded with the MIP investigation, and the results were presented in two reports:

1. *Results of Membrane Interface Probe and Soil Boring Investigations*, Detrex Source Control Area, URS Corp., April 30, 2012, and
2. *Results of Additional Soil Borings Investigation, Detrex Source Control Area*, URS Corp., May 24, 2012.

Follow-up meetings were held on July 10, 2012 with the Fields Brook Action Group (FBAG) and on July 12, 2012 with Detrex Corp. to discuss the results of the MIP and Soil Boring Investigations and DNAPL recovery well design issues.

After review of the data and consultation with FBAG and Detrex, EPA has determined that the pilot test should proceed as outlined in our January 6, 2012 letter and thus Detrex should finalize the February 2012 Work Plan, incorporating the comments provided below, the results of the MIP investigation, and EPA's February 26, 2012 technical comments.

In regard to the Proposed Additional Scope of Work presented in the February 2012 Draft Work Plan, EPA requires the following:

- Task 1 – Existing On-Site Well Inventory – This task should be completed concurrently with finalizing the Pilot Test Work Plan.
- Task 2 – Former Lagoon Test Trenches – Do not proceed with this task at this time.
- Task 3 – MIP Investigation – This task is complete.
- Task 4 – Initial DNAPL Recovery Testing – Information collected from existing wells is needed and should be integrated with the Well Pilot Test (Tasks 5 & 6). For DNAPL characterization, add chemical characterization for VOCs and SVOCs at each of the nine locations.
- Task 5 – Preliminary DNAPL Recovery Well Design – The proposed meetings were held in July. Proceed with finalizing the well designs for six pilot wells, utilizing the MIP results to determine optimal well placements and screen intervals.
- Tasks 6 – DNAPL Recoverability Testing – To begin after the final Pilot Test Work Plan is approved. Recovery testing on existing wells and DNAPL characterization testing can proceed at any time.
- Task 7 – Surveying – Proceed as appropriate.

Please submit a revised work plan and construction schedule to EPA within 21 days.

I can be reached by phone at 312 886-4843 if you have any questions.

Sincerely,



W. Owen Thompson
Remedial Project Manager
Superfund Division

cc: Peter Felitti, U.S. EPA, C-14J
Regan Williams, Ohio EPA NEDO
Robert Currie, Detrex
Martin Schmidt, URS